

REQUIRED STATEMENT TO ACCOMPANY
ALL MOTIONS TO MODIFY STAY

All Cases: Debtor(s) Kenneth B Cavanaugh

Case No. 19-29649

Chapter 13

All Cases: Moving Creditor Wells Fargo Bank, N.A.

Date Case Filed October 18, 2019

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☒ Other (describe) Dismissal

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed January 17, 2020

1. Collateral
 - a. Home 390 North Kingsway Drive, Aurora, IL 60506
 - b. Car Year, Make and Model _____
 - c. Other (describe) _____
2. Balance owed as of April 10, 2020 is \$ 154,436.98
Total of all other liens including collateral \$ 0.00
3. In chapter 13 cases, attach a payment history listing the amount and dates of all payments received from the debtor(s) post-petition:
4. Estimated Value of Collateral (must be supplied in all cases) \$ 179,000.00
5. Default
 - a. Pre-Petition Default
Number of months 10 Amount \$ 18,757.48
 - b. Post-Petition Default
 - i. On direct payments to the moving creditor
Number of months 4 Amount \$ 5,681.71
 - ii. On payments to the Standing Chapter 13 Trustee
Number of months N/A Amount \$ N/A
6. Other Allegations
 - a. Lack of Adequate Protection § 362 (d) (1)
 - i. No Insurance N/A
 - ii. Taxes Unpaid N/A Amount \$ N/A
 - iii. Rapidly depreciating asset N/A
 - iv. Other (describe) N/A
 - b. No Equity and not Necessary for an Effective Reorganization § 362 (d) (2) N/A
 - c. Other "Cause" § 362 (d) (1) N/A
 - i. Bad Faith (describe) N/A
 - ii. Multiple filings N/A
 - iii. Other (describe) N/A
 - d. Debtor's Statement of Intention regarding the collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☐ Surrender
 - iv. ☒ No Statement of Intention Filed

Date: April 16, 2020

/s/ Michael N. Burke
Counsel for Movant